

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOSUE ROMERO, on behalf of himself and all  
others similarly situated,

Plaintiffs,

v.

ZIP TOP, LLC,

Defendant.

**Declaration of Robert D. Moody**

I, Robert D. Moody, declare that I have read the foregoing instrument and the facts and information stated in it are true and correct to the best of my knowledge. I am personally acquainted with the facts stated herein.

1. Presently, I am the President, CEO and Founder of Forensic Data Services (d/b/a FDS Global) (hereafter referred to as FDS) which is based in Broward County, Florida. I am the principal investigator at FDS and frequently testify as an expert in the fields of information systems auditing, information security and computer forensics.

2. I have testified in both State and Federal Courts as an expert in the fields of information systems auditing, information security and computer forensics. My CV is attached as **Exhibit A**.

3. I have experience and training in web design, layout, coding, auditing, and testing of functionality, security, and operability of websites and related content. To date, I have audited more than 800 websites including sites for major industries that operate on many different platforms.

4. In addition, I have identified websites that were both WCAG compliant as well as WCAG non-compliant. For the websites that were found to be non-compliant, Defendants have often relied on my declaration and attachments to bolster remediation efforts and effectively correct issues often faced by Defendants.

5. My company was retained by counsel for Plaintiff, Josue Romero, to provide consulting services and to conduct an audit of a website for compliance, usability, and accessibility standards (WCAG 2.0 and 2.1) as well as general functionality analysis for disabled users.

6. In the present matter, FDS along with me as principal investigator, evaluated the website known as [www.ziptop.com](http://www.ziptop.com). My evaluation was to determine if any issues existed that could not be overcome and, as such acted as barriers to Plaintiff's use of the website as a visually impaired user of the internet.

7. As part of my retention, I independently evaluated the website and determined issues with the identified website do exist and moreover, those issues are a barrier to individuals with low to no vision.

8. Some of issues identified include the following:

- a. The company logo acts as a link designed to take the user from wherever they may be within the Defendant's website to the homepage of that site. For this website, the link is not properly labeled and where the link ("logo") will operate properly (taking the user back to the home page), the missing label prevents the user (visually impaired) to interpret the logo/link and in the case of using a screen reader, the screen reader software cannot properly interpret the logo/link effectively hiding the purpose of that link from the user.
- b. Site element like color options is inaccessible with a keyboard. The first color option is read leaving the user to understand the first color is the only color available for the product.
- c. Site element like Contact Us is not properly labeled to integrate with a screen reader. The cursor skips the text that is not labeled and reads only the email address with no description or association as to what department the email address will be sent to.
- d. Site element such as text located on the website that describes the product or purpose of the site is not labeled to integrate with a screen reader causing the user to lose out on information that a person with normal vision can see and read for themselves.

9. Accordingly, I reserve the right to update, alter, change, and delete, supplement or file an addendum to this declaration if additional material is made available to me and where such material may impact my opinion.

Declarant further sayeth not.

Under penalty of perjury, I hereby affirm that the foregoing statements are true and correct.

Respectfully submitted on, October 20, 2020

*Robert D. Moody*

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**Robert D. Moody**

This tab shows accessibility issues, indicating problems for older users, people with disabilities or accessibility needs. Automated testing cannot detect all accessibility issues, so should be used alongside human testing.

### Level WCAG 2 Section 508 - 2017 PDF Matterhorn 1.02

### Key

A				Pages with level A issues are unusable for some people
AA				Pages with level AA issues are very difficult to use
AAA				Pages with level AAA issues can be difficult to use

### Prio Description and URL

### Guideline and Line#

### Count

## Level A

7 issues on 124 pages

	Each A element must contain text or an IMG with an ALT attribute.	<a href="#">WCAG 2.0 A F89</a> <a href="#">Section 508 (2017) A F89</a>	124 pages
	Add text to the link, or ALT text if the link contains an image. If there is no link text or the ALT text is blank, screen readers have nothing to read, so read out the URL instead.		
	<a href="https://ziptop.com/">https://ziptop.com/</a>	Line <a href="#">1509</a>	
	<a href="https://ziptop.com/account/login">https://ziptop.com/account/login</a>	Line <a href="#">1514</a>	
	<a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">1511</a>	
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">1511</a>	
	<a href="https://ziptop.com/cart">https://ziptop.com/cart</a>	Line <a href="#">1512</a>	
	<a href="https://ziptop.com/collections/all">https://ziptop.com/collections/all</a>	Line <a href="#">1521</a>	
	<a href="https://ziptop.com/collections/all/products/full-set?variant=14206807375914">https://ziptop.com/collections/all/products/full-set?variant=14206807375914</a>	Line <a href="#">1526</a>	
	<a href="https://ziptop.com/collections/all/products/full-set?variant=31429987237930">https://ziptop.com/collections/all/products/full-set?variant=31429987237930</a>	Line <a href="#">1526</a>	
	<a href="https://ziptop.com/pages/about-zip-top">https://ziptop.com/pages/about-zip-top</a>	Line <a href="#">1513</a>	
	<a href="https://ziptop.com/pages/contact-us">https://ziptop.com/pages/contact-us</a>	Line <a href="#">1512</a>	
	<a href="https://ziptop.com/pages/current-promotion-details">https://ziptop.com/pages/current-promotion-details</a>	Line <a href="#">1512</a>	
	<a href="https://ziptop.com/pages/knockoffs">https://ziptop.com/pages/knockoffs</a>	Line <a href="#">1513</a>	
	<a href="https://ziptop.com/pages/store-locator">https://ziptop.com/pages/store-locator</a>	Line <a href="#">1513</a>	
	<a href="https://ziptop.com/pages/terms-and-conditions">https://ziptop.com/pages/terms-and-conditions</a>	Line <a href="#">1513</a>	

Prio	Description and URL	Guideline and Line#	Count
	<a href="https://ziptop.com/products/baby-bear">https://ziptop.com/products/baby-bear</a>	Line <a href="#">1526</a>	
	<a href="https://ziptop.com/products/bag-set">https://ziptop.com/products/bag-set</a>	Line <a href="#">1526</a>	
	<a href="https://ziptop.com/products/cup-set">https://ziptop.com/products/cup-set</a>	Line <a href="#">1526</a>	
	<a href="https://ziptop.com/products/dish-set">https://ziptop.com/products/dish-set</a>	Line <a href="#">1526</a>	
	<a href="https://ziptop.com/products/full-set">https://ziptop.com/products/full-set</a>	Line <a href="#">1526</a>	
	<a href="https://ziptop.com/products/milk-bag-set">https://ziptop.com/products/milk-bag-set</a>	Line <a href="#">1526</a>	
	<p>This issue was found on another 104 pages. You can change the number of pages shown for each issue using the Options menu command in the desktop edition or the Edit Scan button in the OnDemand edition.</p>		
●	Ensure that all information conveyed with color is also available without color, for example from context or markup. This style only contains a color change.	<a href="#">WCAG 2.0 A 1.4.1</a> <a href="#">Section 508 (2017) A 1.4.1</a>	124 pages
	Ensure that each CSS style contains style properties other than color and background-color.		
	<a href="https://ziptop.com/">https://ziptop.com/</a>	Line <a href="#">949</a> <a href="#">962</a> <a href="#">4237</a>	
	<a href="https://ziptop.com/account/login">https://ziptop.com/account/login</a>	Line <a href="#">954</a> <a href="#">967</a> <a href="#">2026</a>	
	<a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">951</a> <a href="#">964</a> <a href="#">2444</a> <a href="#">2461</a> <a href="#">2470</a> ...	
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">951</a> <a href="#">964</a> <a href="#">2444</a> <a href="#">2461</a> <a href="#">2470</a> ...	
	<a href="https://ziptop.com/cart">https://ziptop.com/cart</a>	Line <a href="#">952</a> <a href="#">965</a> <a href="#">2047</a>	
	<a href="https://ziptop.com/collections/all">https://ziptop.com/collections/all</a>	Line <a href="#">961</a> <a href="#">974</a> <a href="#">8829</a> <a href="#">8923</a>	
	<a href="https://ziptop.com/collections/all/products/full-set?variant=14206807375914">https://ziptop.com/collections/all/products/full-set?variant=14206807375914</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">3161</a> <a href="#">3528</a>	
	<a href="https://ziptop.com/collections/all/products/full-set?variant=31429987237930">https://ziptop.com/collections/all/products/full-set?variant=31429987237930</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">3161</a> <a href="#">3528</a>	
	<a href="https://ziptop.com/pages/about-zip-top">https://ziptop.com/pages/about-zip-top</a>	Line <a href="#">953</a> <a href="#">966</a> <a href="#">1974</a>	
	<a href="https://ziptop.com/pages/contact-us">https://ziptop.com/pages/contact-us</a>	Line <a href="#">952</a> <a href="#">965</a> <a href="#">1970</a>	
	<a href="https://ziptop.com/pages/current-promotion-details">https://ziptop.com/pages/current-promotion-details</a>	Line <a href="#">952</a> <a href="#">965</a> <a href="#">2010</a>	
	<a href="https://ziptop.com/pages/knockoffs">https://ziptop.com/pages/knockoffs</a>	Line <a href="#">953</a> <a href="#">966</a> <a href="#">1950</a>	
	<a href="https://ziptop.com/pages/store-locator">https://ziptop.com/pages/store-locator</a>	Line <a href="#">953</a> <a href="#">966</a> <a href="#">1921</a>	
	<a href="https://ziptop.com/pages/terms-and-conditions">https://ziptop.com/pages/terms-and-conditions</a>	Line <a href="#">953</a> <a href="#">966</a> <a href="#">1964</a>	
	<a href="https://ziptop.com/products/baby-bear">https://ziptop.com/products/baby-bear</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">2889</a>	
	<a href="https://ziptop.com/products/bag-set">https://ziptop.com/products/bag-set</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">3073</a> <a href="#">3425</a>	
	<a href="https://ziptop.com/products/cup-set">https://ziptop.com/products/cup-set</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">3167</a> <a href="#">3520</a>	
	<a href="https://ziptop.com/products/dish-set">https://ziptop.com/products/dish-set</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">3122</a> <a href="#">3475</a>	
	<a href="https://ziptop.com/products/full-set">https://ziptop.com/products/full-set</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">3151</a> <a href="#">3504</a>	

Prio	Description and URL	Guideline and Line#	Count
	<a href="https://ziptop.com/products/milk-bag-set">https://ziptop.com/products/milk-bag-set</a>	Line <a href="#">966</a> <a href="#">979</a> <a href="#">2908</a>	
	This issue was found on another 104 pages. You can change the number of pages shown for each issue using the Options menu command in the desktop edition or the Edit Scan button in the OnDemand edition.		
●	Removing the underline from links makes it hard for color-blind users to see them.	<a href="#">WCAG 2.0 A F73</a> <a href="#">Section 508 (2017) A F73</a>	2 pages
	Remove the text-decoration:none property from your link styles, or add other non-color style attributes to visually distinguish links.		
	<a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">2231</a> <a href="#">2440</a>	
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">2231</a> <a href="#">2440</a>	
●	This form control has no LABEL and no programmatically determined name.	<a href="#">WCAG 2.0 A F68</a> <a href="#">Section 508 (2017) A F68</a>	113 pages
	A programmatically determined name allows screen readers to tell the user what the control does. To add a name do one of the following:		
	<ul style="list-style-type: none"><li>• Use a LABEL element with the FOR attribute set to the ID of the form control</li><li>• Wrap a LABEL element around the form control</li><li>• Add a TITLE attribute</li><li>• Add an ARIA-LABELLEDBY attribute (not supported in all screen readers)</li><li>• Add an ARIA-LABEL attribute (not supported in all screen readers)</li></ul>		
	INPUT elements labelled with the ARIA-LABEL attribute don't work in:		
	<ul style="list-style-type: none"><li>• SaToGo with IE11 (the previous heading is read instead of the label)</li></ul>		
	<a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">2813</a>	
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">2813</a>	
	<a href="https://ziptop.com/collections/all/products/bag-set?variant=31064505745450">https://ziptop.com/collections/all/products/bag-set?variant=31064505745450</a>	Line <a href="#">2786</a>	
	<a href="https://ziptop.com/collections/all/products/bag-set?variant=31064505810986">https://ziptop.com/collections/all/products/bag-set?variant=31064505810986</a>	Line <a href="#">2786</a>	
	<a href="https://ziptop.com/collections/all/products/cup-set?variant=31064528289834">https://ziptop.com/collections/all/products/cup-set?variant=31064528289834</a>	Line <a href="#">2880</a>	
	<a href="https://ziptop.com/collections/all/products/dish-set?variant=31064541626410">https://ziptop.com/collections/all/products/dish-set?variant=31064541626410</a>	Line <a href="#">2833</a>	

Prio	Description and URL	Guideline and Line#	Count
	<a href="https://ziptop.com/collections/all/products/dish-set?variant=31064541659178">https://ziptop.com/collections/all/products/dish-set? variant=31064541659178</a>	Line <a href="#">2833</a>	
	<a href="https://ziptop.com/collections/all/products/full-set?variant=14206807375914">https://ziptop.com/collections/all/products/full-set? variant=14206807375914</a>	Line <a href="#">2864</a>	
	<a href="https://ziptop.com/collections/all/products/full-set?variant=31429987237930">https://ziptop.com/collections/all/products/full-set? variant=31429987237930</a>	Line <a href="#">2864</a>	
	<a href="https://ziptop.com/collections/all/products/large-dish?variant=31064543526954">https://ziptop.com/collections/all/products/large-dish? variant=31064543526954</a>	Line <a href="#">3283</a>	
	<a href="https://ziptop.com/collections/all/products/medium-dish?variant=31064542871594">https://ziptop.com/collections/all/products/medium-dish? variant=31064542871594</a>	Line <a href="#">3283</a>	
	<a href="https://ziptop.com/collections/all/products/sandwich-bag?variant=31064504991786">https://ziptop.com/collections/all/products/sandwich-bag? variant=31064504991786</a>	Line <a href="#">3236</a>	
	<a href="https://ziptop.com/collections/all/products/small-dish?variant=31064542216234">https://ziptop.com/collections/all/products/small-dish? variant=31064542216234</a>	Line <a href="#">3283</a>	
	<a href="https://ziptop.com/collections/all/products/snack-bag?variant=31064502206506">https://ziptop.com/collections/all/products/snack-bag? variant=31064502206506</a>	Line <a href="#">3236</a>	
	<a href="https://ziptop.com/products/baby-bear">https://ziptop.com/products/baby-bear</a>	Line <a href="#">2293</a>	
	<a href="https://ziptop.com/products/bag-set">https://ziptop.com/products/bag-set</a>	Line <a href="#">2776</a>	
	<a href="https://ziptop.com/products/cup-set">https://ziptop.com/products/cup-set</a>	Line <a href="#">2870</a>	
	<a href="https://ziptop.com/products/dish-set">https://ziptop.com/products/dish-set</a>	Line <a href="#">2823</a>	
	<a href="https://ziptop.com/products/full-set">https://ziptop.com/products/full-set</a>	Line <a href="#">2854</a>	
	<a href="https://ziptop.com/products/milk-bag-set">https://ziptop.com/products/milk-bag-set</a>	Line <a href="#">2305</a>	

This issue was found on another 93 pages. You can change the number of pages shown for each issue using the Options menu command in the desktop edition or the Edit Scan button in the OnDemand edition.

- This page has duplicate IDs which cause problems in screen readers. [WCAG 2.0 A F77](#) [Section 508 \(2017\) A F77](#) 1 pages  
Two or more elements on this page share the same ID, which cause problems in screen readers which use IDs for labeling controls and table headings. This also causes problems in JavaScript methods like getElementById and querySelector, which behave inconsistently when duplicate IDs are present. Change the ID so it is unique for each element.  
<https://ziptop.com/collections/all> Line [3286](#)
- This page has markup errors, causing screen readers to miss content. [WCAG 2.0 A F70](#) [Section 508 \(2017\) A F70](#) 3 pages  
Fix the errors listed on the Standards tab of this report. Markup errors like missing end tags mean screen readers may skip important content.  
<https://ziptop.com/apps/help-center>

Prio	Description and URL	Guideline and Line#	Count
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">2499</a> <a href="#">2501</a> <a href="#">4396</a> <a href="#">4705</a> <a href="#">4709</a> ...	
	<a href="https://ziptop.com/collections/all">https://ziptop.com/collections/all</a>	Line <a href="#">2499</a> <a href="#">2501</a> <a href="#">4396</a> <a href="#">4705</a> <a href="#">4709</a> ...	
		Line <a href="#">3286</a>	
●	Using ALT text which duplicates link text in the same link or the following link results in screen readers stuttering as the same text is read out twice.	<a href="#">WCAG 2.0 A H2</a> <a href="#">Section 508 (2017) A H2</a>	15 pages
	Use ALT=" when the image is part of a link containing text, or change the redundant ALT text if the links are separate.		
	<a href="https://ziptop.com/collections/all/products/baby-4-set?variant=31457778892842">https://ziptop.com/collections/all/products/baby-4-set? variant=31457778892842</a>	Line <a href="#">2174</a> <a href="#">2185</a> <a href="#">2196</a> <a href="#">2207</a>	
	<a href="https://ziptop.com/collections/all/products/baby-bear?variant=31064562827306">https://ziptop.com/collections/all/products/baby-bear? variant=31064562827306</a>	Line <a href="#">2260</a> <a href="#">2271</a> <a href="#">2282</a> <a href="#">2293</a>	
	<a href="https://ziptop.com/collections/all/products/baby-cat?variant=31064558665770">https://ziptop.com/collections/all/products/baby-cat? variant=31064558665770</a>	Line <a href="#">2260</a> <a href="#">2271</a> <a href="#">2282</a> <a href="#">2293</a>	
	<a href="https://ziptop.com/collections/all/products/baby-dog?variant=31064566497322">https://ziptop.com/collections/all/products/baby-dog? variant=31064566497322</a>	Line <a href="#">2260</a> <a href="#">2271</a> <a href="#">2282</a> <a href="#">2293</a>	
	<a href="https://ziptop.com/collections/all/products/baby-pig?variant=31064567021610">https://ziptop.com/collections/all/products/baby-pig? variant=31064567021610</a>	Line <a href="#">2260</a> <a href="#">2271</a> <a href="#">2282</a> <a href="#">2293</a>	
	<a href="https://ziptop.com/products/baby-4-set">https://ziptop.com/products/baby-4-set</a>	Line <a href="#">2164</a> <a href="#">2175</a> <a href="#">2186</a> <a href="#">2197</a>	
	<a href="https://ziptop.com/products/baby-4-set?variant=31457778892842">https://ziptop.com/products/baby-4-set? variant=31457778892842</a>	Line <a href="#">2164</a> <a href="#">2175</a> <a href="#">2186</a> <a href="#">2197</a>	
	<a href="https://ziptop.com/products/baby-bear">https://ziptop.com/products/baby-bear</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	
	<a href="https://ziptop.com/products/baby-bear?variant=31064562827306">https://ziptop.com/products/baby-bear? variant=31064562827306</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	
	<a href="https://ziptop.com/products/baby-cat">https://ziptop.com/products/baby-cat</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	
	<a href="https://ziptop.com/products/baby-cat?variant=31064558665770">https://ziptop.com/products/baby-cat? variant=31064558665770</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	
	<a href="https://ziptop.com/products/baby-dog">https://ziptop.com/products/baby-dog</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	
	<a href="https://ziptop.com/products/baby-dog?variant=31064566497322">https://ziptop.com/products/baby-dog? variant=31064566497322</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	
	<a href="https://ziptop.com/products/baby-pig">https://ziptop.com/products/baby-pig</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	
	<a href="https://ziptop.com/products/baby-pig?variant=31064567021610">https://ziptop.com/products/baby-pig? variant=31064567021610</a>	Line <a href="#">2250</a> <a href="#">2261</a> <a href="#">2272</a> <a href="#">2283</a>	

## Level AA

5 issues on 4 pages

Prio	Description and URL	Guideline and Line#	Count
	Ensure that foreground and background colors have enough contrast.  Some users find it hard to read light gray text on a white background, dark gray text on a black background and white text on a red background.  <ul style="list-style-type: none"><li>• The contrast ratio should be 3.0 or more for 18 point text, or larger</li><li>• The contrast ratio should be 3.0 or more for 14 point bold text, or larger</li><li>• The contrast ratio should be 4.5 or more for all other text</li></ul>	<a href="#">WCAG 2.0 AA 1.4.3</a> <a href="#">Section 508 (2017) AA 1.4.3</a>	2 pages
	The foreground to background color contrast ratio is: 4.1 with color: rgb(255,255,255); background-color: rgb(213,81,24); font-size: 12pt; font-weight: 400 3.3 with color: rgb(255,255,255); background-color: rgb(0,151,207); font-size: 12pt; font-weight: 400 3.3 with color: rgb(255,255,255); background-color: rgb(0,151,207); font-size: 12pt; font-weight: 400 <a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">2307</a> <a href="#">2460</a> <a href="#">2461</a>	
	The foreground to background color contrast ratio is: 4.1 with color: rgb(255,255,255); background-color: rgb(213,81,24); font-size: 12pt; font-weight: 400 3.3 with color: rgb(255,255,255); background-color: rgb(0,151,207); font-size: 12pt; font-weight: 400 3.3 with color: rgb(255,255,255); background-color: rgb(0,151,207); font-size: 12pt; font-weight: 400 <a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">2307</a> <a href="#">2460</a> <a href="#">2461</a>	
	Form field labels should be unique on a page, or enclosed in a FIELDSET with a LEGEND that makes the label unique.  When a form contains items with the same label, screen reader users find it difficult to tell them apart. Adding a fieldset with a legend differentiates the controls, because the legend text is announced along with the label text. For example: <legend> Gift wrapped: </legend> <label> Yes </label> <label> No </label> <legend> Express delivery: </legend> <label> Yes </label> <label> No </label>	<a href="#">WCAG 2.0 AA 2.4.6</a> <a href="#">Section 508 (2017) AA 2.4.6</a>	1 pages
	Label used: &#13;&#10;Email &#13;&#10;Email <a href="https://ziptop.com/account/login">https://ziptop.com/account/login</a>	Line <a href="#">1893</a> <a href="#">1969</a>	
	Headings should not be empty.  Add text to the heading, or ALT text if the heading contains an image. Screen readers read out page headings, allowing users to quickly skip to a section, but	<a href="#">WCAG 2.0 AA G130</a> <a href="#">Section 508 (2017) AA G130</a>	1 pages

Prio	Description and URL	Guideline and Line#	Count
	some older screen readers do not ignore empty headings.  Impact on users: <ul style="list-style-type: none"><li>• SaToGo 3.4.96.0 IE11 Windows 7 Heading: Reads following paragraph as heading.</li></ul>		
	<a href="https://ziptop.com/">https://ziptop.com/</a>	Line <a href="#">1505</a>	
	This CSS style makes it difficult or impossible to see the dotted link focus outline.  Change the style to avoid obscuring the focus outline around A elements, which is used when tabbing through links. Using a border or outline style that obscures the focus ring causes problems for keyboard-only users in: Chrome (obscures the focus indicator on links, buttons, dropdowns and range controls) Firefox (obscures the focus indicator on links) Internet Explorer (obscures the focus indicator on links, buttons and range controls)	<a href="#">WCAG 2.0 AA F78</a> <a href="#">Section 508 (2017) AA F78</a>	2 pages
	<a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">2138</a>	
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">2138</a>	
	Use relative rather than absolute units in CSS property values.  Absolute units are CM, MM, IN, PC and PT. When used with fonts PX is also considered an absolute unit, because it isn't relative the user's preferred font size. Low-vision users, and a lot of people over 50, increase the browser default font size to make text easier to read. Absolute units ignore this user choice. Relative units like EM and percentages "stretch" according to the screen size and/or user's preferred font size, and work on a large range of devices.	<a href="#">WCAG 2.0 AA 1.4.4</a> <a href="#">Section 508 (2017) AA 1.4.4</a>	2 pages
	<a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">2196</a> <a href="#">2212</a> <a href="#">2220</a> <a href="#">2257</a> <a href="#">2402</a> ...	
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">2196</a> <a href="#">2212</a> <a href="#">2220</a> <a href="#">2257</a> <a href="#">2402</a> ...	

## Level AAA

2 issues on 5 pages

	Avoid specifying a new window as the target of a link with target="_blank".  Displaying new windows without warning can be very confusing to non-sighted and mobile users. Some screen	<a href="#">WCAG 2.0 AAA F22</a>	3 pages
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Prio	Description and URL	Guideline and Line#	Count
	readers and mobile devices give very little indication a new tab or window has opened. If you cannot avoid displaying a new window, insert a warning into the link text like the following: "opens in a new window".		
	<a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">4044 4143</a>	
	<a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">4044 4143</a>	
	<a href="https://ziptop.com/pages/about-zip-top">https://ziptop.com/pages/about-zip-top</a>	Line <a href="#">1938 1942</a>	
	Several links on a page share the same link text, but go to different destinations.	<a href="#">WCAG 2.0 AAA 2.4.9</a>	4 pages
	Make the link text unique for each target, or add additional text using aria-label.		
	Link text: &#13;&#10;Contact &#13;&#10;&#13;&#10; Contact&#13;&#10; <a href="https://ziptop.com/apps/help-center">https://ziptop.com/apps/help-center</a>	Line <a href="#">4310 4925</a>	
	Link text: &#13;&#10;Contact &#13;&#10;&#13;&#10; Contact&#13;&#10; <a href="https://ziptop.com/apps/help-center#!what-is-your-return-policy">https://ziptop.com/apps/help-center#!what-is-your-return-policy</a>	Line <a href="#">4310 4925</a>	
	Link text: &#13;&#10;Continue shopping&#13;&#10;&#13;&#10;&#13;&#10; &#13;&#10;&#13;&#10; Continue shopping&#13;&#10; <a href="https://ziptop.com/cart">https://ziptop.com/cart</a>	Line <a href="#">1872 2013</a>	
	Link text: &#13;&#10;&#13;&#10; &#13;&#10;Dish Set&#13;&#10;&#13;&#10; &#13;&#10;&#13;&#10; &#13;&#10;Cup Set&#13;&#10;&#13;&#10; &#13;&#10;&#13;&#10; &#13;&#10;Bag Set&#13;&#10;&#13;&#10; &#13;&#10;&#13;&#10; &#13;&#10;Dish Set&#13;&#10;&#13;&#10; &#13;&#10;&#13;&#10; &#13;&#10;Bag Set&#13;&#10;&#13;&#10;	Line <a href="#">2340 2595 2850 3259</a> <a href="#">4606 ...</a>	